



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EAG:MCM/NS
F. #2019R00029

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 2, 2021

By ECF

The Honorable Ann M. Donnelly
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Robert Sylvester Kelly
Criminal Docket No. 19-286 (S-3) (AMD)

Dear Judge Donnelly:

Pursuant to the Court's February 9, 2021 Order, enclosed please find the parties' Joint Proposed Jury Charge (the "Jury Charge") and verdict form in the above-referenced matter, with the following exceptions to the joint nature of the Jury Charge. Defense counsel objects to two of the requests set forth in the Jury Charge and proposes alternate language, to which the government objects. A copy of their requests is enclosed.

Respectfully submitted,

JACQUELYN M. KASULIS
Acting United States Attorney

By: /s/
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cc: Counsel of Record (By ECF)